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FCC Mail Room

May 27, 2011

**Japan GPS Council**

Tojo Bldg. 8F, 3-16-10 Yushima, Bunkyo-ku  
Tokyo, 113-0034 Japan  
TEL 81(3)3839-6844, FAX 81(3)3839-2166

1B Docket  
11-109

The Honorable Julius Genachowski  
Chairman  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Room 8B201  
Washington, DC 20554

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Re: LightSquared Application Request for Modification of its Authority for  
Ancillary Terrestrial Component (FCC File No. SAT-MOD-20101118-0039)

I write to you on behalf of the memberships of the Japan GPS Council. The Japan GPS Council (JGPSC) is the non-profit association composed of the major firms and organizations of the civil GPS applications and users in Japan. Its activities are to concentrate proper understandings on that the GPS is the civil/military dual technology, and so are centered on creating a better environment of peaceful civil utilization of the GPS.

US and Japan have enjoyed a unique cooperative relationship on GPS since before the 1998 political communication between Clinton-Obuchi established a formal cooperative framework. This relationship has enabled GPS to become a global standard for positioning, navigation and timing, and has provided a solid foundation for billions of dollars in commercial investment, and development of products, applications and services.

US and Japanese firms are global leaders in commercial markets of the GPS products and services, and as a result of clear and non-preferential policies have worked through healthy competition in open markets to build robust industries serving a wide range of users in both countries.

US and Japan have worked in close cooperation at the domestic level as well as in international fora to protect and preserve spectrum for GPS in order to safeguard national security applications as well as maintain flexibility and opportunity for continued commercial innovation and critical public infrastructure.

Any threat to the integrity or availability of GPS in US markets would undermine and devalue the substantial investment that Japanese firms have made to serve users and customers in the US. Japanese firms provide products and equipment for high-precision applications to US customers, Japanese automotive manufacturers and aftermarket equipment suppliers are major suppliers of navigation equipment and services to US consumers, and Japanese airlines rely on GPS for safety when operating in US skies.

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If allowed to proceed as proposed, the interference emanating from LightSquared transmitters could require billions of dollars of reengineering costs on the part of Japanese manufacturers to serve established customers in the US, and could also result in lost markets

where mitigation option would not be feasible.

Any policy which would allow degradation of GPS service in the US would also raise question as to the integrity of the stated US commitment to maintain GPS as a stable and reliable global standard for positioning, navigation and timing.

We look forward to responding to any questions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Hiroshi Nishiguchi', with a stylized flourish at the end.

Hiroshi Nishiguchi  
Secretary General

Cc (by Email): JGPSC memberships.